

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**JANE DOES 1-9,**

**Plaintiffs,**

**vs.**

**COLLINS MURPHY, LIMESTONE  
COLLEGE, MG FREESITES, LTD., d/b/a  
PORNHUB.COM and HAMMY MEDIA  
LTD. d/b/a XHAMSTER.COM,**

**Defendants.**

**Case No: 7:20-cv-00947-JD**

**CONSENT MOTION FOR  
EXTENSION OF TIME**

**NOW COMES LIMESTONE UNIVERSITY** (incorrectly identified as “Limestone College”), a Defendant to the above-captioned action, and hereby pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure moves the Court for an order extending the time within which Defendant Limestone may file a reply to Plaintiffs’ Fourth Motion to Amend/Correct the Complaint (“Plaintiffs’ Motion”) (ECF No. 145), showing the following:

1.

Plaintiffs filed and electronically served Defendant Limestone with Plaintiffs’ Motion on or about November 9, 2021.

2.

Pursuant to the Rules, Defendant Limestone Defendant Limestone’s reply to Plaintiffs’ Response is due on or about November 23, 2021.

3.

Upon conferring, Plaintiffs' counsel granted counsel for Defendant Limestone a fourteen (14) day extension to reply to Plaintiffs' Motion. Plaintiffs' counsel confirmed this extension in writing.

4.

This is the first extension granted to Defendant Limestone related to Plaintiffs' Motion. The new due date would be December 7, 2021.

5.

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings.

6.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

**WHEREFORE**, Defendant Limestone respectfully requests this Court grant Defendant Limestone's Motion and enter an order extending the time in which it may file a Reply by fourteen (14) days.

**(SIGNATURES ON FOLLOWING PAGE)**

This 19<sup>th</sup> day of November, 2021.

**RAHIMI, HUGHES & PADGETT, LLC**

**/s/ JOSEPH Y. RAHIMI II**

**JOSEPH Y. RAHIMI II**

Federal ID No. 9670

**JOHN A. HUBERT**

Federal ID No. 13154

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**CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing **CONSENT MOTION FOR EXTENSION OF TIME** has been served on counsel for all parties by placing same in the United States Mail in a properly addressed envelope with sufficient postage affixed thereon and/or via electronic mail to all other counsel of record to ensure delivery to:

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This 19<sup>th</sup> day of November, 2021.

**RAHIMI, HUGHES & PADGETT, LLC**

**/s/ JOSEPH Y. RAHIMI II**

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